

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

ORDER RE: PLAINTIFFS' MOTION
FOR AN ORDER REGARDING
PROTECTIVE ORDER STANDARDS
APPLICABLE TO CLAW BACKS IN
PLAINTIFFS' CASES

ELIZABETH DE COSTER, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

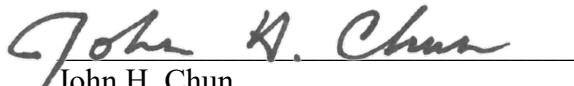
ORDER RE: PROTECTIVE ORDER STANDARDS
APPLICABLE TO CLAW BACKS IN PLAINTIFFS'
CASES

Case Nos. 2:20-cv-00424-JHC, 2:21-cv-00693-JHC, 2:22-cv-00965-JHC

1 This matter comes before the Court on Plaintiffs' Motion for an Order Regarding
2 Protective Order Standards Applicable to Claw Backs in Plaintiffs' Cases (the Motion). Case
3 No. 20-424, Dkt. # 320; Case No. 21-693, Dkt. # 352; Case No. 22-965, Dkt. # 194. The Court
4 has considered the materials filed in support of and in opposition to the motion, the rest of the
5 file, and the governing law. Being fully advised, the Court GRANTS in part and DENIES in part
6 Plaintiffs' motion.

7 To claw back any documents in Plaintiffs' cases, Amazon must make a showing of
8 inadvertence under Rule of Evidence 502(b), regardless of whether the documents were
9 produced to Plaintiffs after having been previously produced in another action, or initially
10 withheld in another action on the basis of privilege and produced first to Plaintiffs. *See* Case No.
11 20-424, Dkt. ## 294, 312; Case No. 21-693, Dkt. ## 302, 329; Case No. 22-965, Dkt. ## 170,
12 185. The Court declines to find waiver or award fees and costs.

13 DATED: July 17, 2025.

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16 John H. Chun
United States District Judge